1 Bob H. Joyce, (SBN 84607) LAW OFFICES OF 2 LEBEAU • THELEN, LLP 5001 East Commercenter Drive, Suite 300 3 Post Office Box 12092 Bakersfield, California 93389-2092 4 (661) 325-8962; Fax (661) 325-1127 5 Attorneys for DIAMOND FARMING COMPANY, a California corporation, CRYSTAL ORGANIC FARMS, a limited liability company, GRIMMWAY 6 ENTERPRISES, INC., and LAPIS LAND COMPANY, LLC 7 8 SUPERIOR COURT OF THE STATE OF CALIFORNIA 9 IN AND FOR THE COUNTY OF SANTA CLARA 10 11 Coordination Proceeding Special Title Judicial Council Coordination No. 4408 (Rule 1550 (b)) 12 ANTELOPE VALLEY GROUNDWATER Case No.: 1-05-CV-049053 13 CASES DIAMOND FARMING COMPANY, 14 Included actions: CRYSTAL ORGANIC FARMS, GRIMMWAY ENTERPRISES, INC., 15 Los Angeles County Waterworks District No. AND LAPIS LAND COMPANY, LLC'S 40 vs. Diamond Farming Company JOINDER IN BOLTHOUSE 16 Los Angeles Superior Court PROPERTIES, LLC AND WM. Case No. BC 325201 **BOLTHOUSE FARMS, INC.'S** 17 OPPOSITION TO BLUM TRUST'S Los Angeles County Waterworks District No. MOTION FOR SUMMARY 18 40 vs. Diamond Farming Company JUDGMENT/SUMMARY Kern County Superior Court ADJUDICATION OF ISSUES 19 Case No. S-1500-CV 254348 NFT December 22, 2014 Date: 20 Diamond Farming Company vs. City of Time: 10:00 a.m. Lancaster TBD Dept: 21 Riverside County Superior Court Judge: Hon. Jack Komar Lead Case No. RIC 344436 [Consolidated 22 w/Case Nos. 344668 & 3538401 23 AND RELATED CROSS-ACTIONS. 24 25 /// 26 /// 27 /// 28 DIAMOND FARMING COMPANY, CRYSTAL ORGANIC FARMS, GRIMMWAY ENTERPRISES, INC., AND LAPIS LAND COMPANY, LLC'S JOINDER IN BOLTHOUSE PROPERTIES, LLC AND WM. BOLTHOUSE

FARMS, INC.'S OPPOSITION TO BLUM TRUST'S MOTION FOR SUMMARY JUDGMENT/SUMMARY ADJUDICATION OF ISSUES

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TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

If and to the extent the Court overrules DIAMOND FARMING COMPANY, CRYSTAL ORGANIC FARMS, GRIMMWAY ENTERPRISES, INC., and LAPIS LAND COMPANY, LLC's (hereafter "Grimmway"), objection, and considers the motion as against Grimmway on the merits, then Grimmway joins the opposition filed by BOLTHOUSE PROPERTIES, LLC and WM. BOLTHOUSE FARMS, INC.

Diamond Farming Company, Crystal Organic Farms, Grimmway Enterprises, Inc., and LAPIS Land Company, LLC hereby join in (1) Bolthouse Properties, LLC and Wm. Bolthouse Farms, Inc.'s Opposition to Blum Trust's Motion for Summary Judgment/Summary Adjudication of Issues; (2) Declaration of Richard G. Zimmer in Support of Bolthouse Properties, LLC and Wm. Bolthouse Farms, Inc. Opposition to Blum Trust's Motion for Summary Judgment/Summary Adjudication of Issues; (3) Bolthouse Properties, LLC and Wm. Bolthouse Farms, Inc. Response to Blum Trust's Separate Statement of Undisputed Material Facts in Support of Motion for Summary Judgment/Summary Adjudication; (4) Bolthouse Properties, LLC and Wm. Bolthouse Farms, Inc. Objections to Evidence Submitted by Blum Trust in Support of Motion for Summary Judgment/Summary Adjudication; and [Proposed] Order; and (5) Bolthouse Properties, LLC and Wm. Bolthouse Farms, Inc. Opposition to Blum Trust's Request for Judicial Notice in Support of Motion for Summary Judgment/Summary Adjudication of Issues, filed on December 8, 2014.

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Dated: December 8, 2014

LeBEAU • THELEN, LLP

BOB H. JOYCE

COMPANY, LLC

Attorneys for DIAMOND FARMING COMPANY,

a California corporation, CRYSTAL ORGANIC FARMS, a limited liability company, GRIMMWAY

ENTERPRISES, INC., and LAPIS LAND

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By:

PROOF OF SERVICE

ANTELOPE VALLEY GROUNDWATER CASES 2 JUDICIAL COUNCIL PROCEEDING NO. 4408 CASE NO.: 1-05-CV-049053 3 I am a citizen of the United States and a resident of the county aforesaid; I am over the age 4 of eighteen years and not a party to the within action; my business address is: 5001 E. Commercenter Drive, Suite 300, Bakersfield, California 93309. On <u>December 8</u>, 2014, I served the within 5 DIAMOND FARMING COMPANY, CRYSTAL ORGANIC FARMS, GRIMMWAY ENTERPRISES, INC., AND LAPIS LAND COMPANY, LLC'S JOINDER IN BOLTHOUSE 6 PROPERTIES, LLC AND WM. BOLTHOUSE FARMS, INC.'S OPPOSITION TO BLUM TRUST'S MOTION FOR SUMMARY JUDGMENT/SUMMARY ADJUDICATION OF **ISSUES** 8 (BY POSTING) I am "readily familiar" with the Court's Clarification Order. 9 Electronic service and electronic posting completed through www.scefiling.org; All papers filed in Los Angeles County Superior Court and copy sent to trial judge and Chair of Judicial Council. Los Angeles County Superior Court Chair, Judicial Council of California 111 North Hill Street Administrative Office of the Courts Los Angeles, CA 90012 Attn: Appellate & Trial Court Judicial Services Attn: Department 1 (Civil Case Coordinator) (213) 893-1014 Carlotta Tillman 455 Golden Gate Avenue San Francisco, CA 94102-3688 Fax (415) 865-4315 15 (BY MAIL) I am "readily familiar" with the firm's practice of collection and 16 processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Bakersfield, California, in 17 the ordinary course of business. 18 (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct, and that the foregoing was executed on December 8, 2014, in Bakersfield, California. 21

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